

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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BRYCE MARTINEZ	:	
	:	
Plaintiff,	:	
	:	Civil Case No. 2:25-cv-00377-MRP
v.	:	
	:	<b>JURY TRIAL DEMANDED</b>
KRAFT HEINZ COMPANY, INC., et al.	:	
	:	
Defendants.	:	

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**STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS  
TO RESPOND TO COMPLAINT**

WHEREAS, on January 22, 2025, Defendant The Kraft Heinz Company, identified in the caption as Kraft Heinz Company, Inc., filed a Notice of Removal in this action;

WHEREAS, Defendants in this action have been served on various dates and therefore currently have differing deadlines to respond to Plaintiff's Complaint;

WHEREAS, the current earliest deadline for any Defendant to respond to the Complaint is January 29, 2025;

WHEREAS, to promote efficiency in responding to Plaintiff's Complaint, Defendants requested a uniform deadline and extension to respond to Plaintiff's Complaint and further requested that the deadline be the later of 60 days from January 29, 2025 or 30 days from a ruling on any motion to remand, should one be filed by Plaintiff;

WHEREAS, Plaintiff stipulates and agrees to this request; and

WHEREAS, an extension to respond to Plaintiff's Complaint will not otherwise impact any other deadlines in this matter.

IT IS THEREFORE STIPULATED AND AGREED that:

The deadline for all Defendants to respond to Plaintiff's Complaint is extended to the later of March 31, 2025 or 30 days from the ruling on any remand motion, should one be filed by Plaintiffs.

Pursuant to Local Rule of Civil Procedure 5.1.2(9), the undersigned attorneys have consented to the submission of this document by counsel for Defendant The Kraft Heinz Company.

Dated: January 28, 2025

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*Counsel for Defendant Conagra Brands, Inc.*

**IT IS SO ORDERED:**

Dated: \_\_\_\_\_

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Hon. Mia Roberts Perez